



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*26 Federal Plaza, 37th Floor
New York, New York 10278*

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BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

**Re: *United States v. Alon Alexander, Oren Alexander, and Tal Alexander*
24 Cr. 676 (VEC)**

Dear Judge Caproni:

The Government writes to update the Court on the status of proceedings in the Southern District of Florida and to request the Court vacate the currently scheduled bail appeal hearing for Tal Alexander and instead schedule a consolidated hearing to decide the bail appeals/bail applications of all three defendants on January 10, 2025. The request for the consolidated hearing is jointly made by the Government and the defendants.

All three defendants have now been arrested and made initial appearances in the Southern District of Florida. Magistrate Judges in that district have ordered that Alon and Tal Alexander be detained pending trial and that they be removed to the Southern District of New York. Tal Alexander has filed an appeal of his detention order with the Court, and Alon Alexander also intends to appeal his detention order. Tal Alexander's bail appeal hearing is currently scheduled for January 8, 2025.

After a second adjournment, Oren Alexander is scheduled for a detention and removal hearing in the Southern District of Florida on Tuesday, January 7, 2025. Counsel for Oren Alexander, Richard Klugh, has informed the Government that his client intends to waive further proceedings in Florida and will ask this Court to decide his bail application in the first instance.

The parties jointly request that the Court hold a consolidated hearing on Friday, January 10, 2025 to decide the bail appeals of Alon and Tal Alexander and the initial bail application of Oren Alexander. All three defendants are currently in federal custody in Miami, and defense counsel have represented they will waive their clients' presence at the bail hearing. In advance of

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE